Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MM Docket No. 87-268
and Their Impact upon the	)	
Existing Television Broadcast	)	
Service	)	

SUPPLEMENT TO PETITION FOR RECONSIDERATION

Allbritton Communications Company, together with its Licensee Subsidiaries (collectively, "Allbritton"), 1/ by its attorneys, hereby supplements its Petition for Reconsideration of the *Fifth Report and Order* and *Sixth Report and Order* in the above-captioned proceeding. 2/ Allbritton, in its Petition for

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1/ The Licensee Subsidiaries include the following entities, all of which are direct or indirect subsidiaries of Allbritton Communications Company: KTUL Television Inc., licensee of Television Broadcast Station KTUL, Tulsa, Oklahoma; Harrisburg Television Inc., licensee of Television Broadcast Station WHTM-TV; WSET Incorporated, licensee of Television Broadcast Station WSET-TV, Lynchburg, Virginia; and First Charleston Corp., licensee of Television Broadcast Station WCIV, Charleston, South Carolina. Allbritton also programs Television Broadcast Station WJSU-TV, Anniston, Alabama, pursuant to a time-brokerage agreement with RKZ Television, Inc., licensee of WJSU-TV, which joins Allbritton in this supplemental filing.

2/ *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Fifth Report and Order*, FCC 97-116 (April 21, 1997); *Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Sixth Report and Order*, FCC 97-115 (April 21, 1997) ("*ATV Order*"). The Commission explicitly provided for this opportunity to supplement petitions for reconsideration in conjunction with the release of OET Bulletin No. 69. *See*

Reconsideration, contended that a number of the Commission's proposed DTV allotments place Allbritton in a competitively untenable position. Based on the DTV table of allotments adopted by the Commission in the *Sixth Report and Order*, Appendix B, five stations owned or programmed by Allbritton have been saddled with DTV allotments outside the core spectrum. Unlike television stations with core DTV allotments, these stations will not be able to continue to operate on their DTV allotments after the transition period. At that time, each station will lose its initial DTV allotment as well as most or all of the resources that the station will have invested in construction for that allotment. Because each of these stations is virtually certain to undertake the construction and operation of new transmitters and related facilities exclusively for its initial DTV allotment, the current non-core allotments will waste significant amounts of time, equipment, and money.

Moreover, the non-core DTV channels allotted to these five stations are unnecessary. As the attached technical reports demonstrate, a DTV allotment within the core spectrum is available to each of these stations. Nor are any of these substitute allotments projected to cause unacceptable levels of interference. Because the substitute DTV allotments would permit these stations to operate most efficiently without interfering with other broadcast stations, Allbritton urges the Commission to adopt the substitute DTV specifications for each of the following stations.

Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service, Order, DA 97-1377 (OET rel. July 2, 1997).

1. KTUL(TV), Tulsa, Oklahoma

Allbritton requests the Commission to allot channel 27 to KTUL for its DTV operations. KTUL, which has an NTSC allotment of channel 8, is currently allotted channel 58 as its DTV channel. However, as the attached engineering statement describes, Allbritton's requested allotment of channel 27 would permit the station to secure a core DTV channel without causing inordinate interference to other stations. *See* Exhibit 1.

2. WHTM-TV, Harrisburg, Pennsylvania

The Commission should allot UHF channel 42 to WHTM-TV for its DTV operations. WHTM-TV's NTSC allotment is channel 27, and its current DTV allotment is channel 57. The attached engineering statement underscores that channel 42, an allotment within the core television broadcast spectrum, is not projected to cause excessive interference to other stations in the area. *See* Exhibit 2.

3. WSET-TV, Lynchburg, Virginia

Allbritton requests the Commission to adopt channel 34 as WSET-TV's DTV allotment. WSET's NTSC allotment is channel 13, and its current DTV allotment is channel 56. This substitute allotment would ensure WSET-TV a DTV channel within the core spectrum without resulting in excessive interference. *See* Exhibit 3.

4. WJSU-TV, Anniston, Alabama

The Commission should adopt two limited changes with regard to WJSU-TV, which currently operates on NTSC channel 40 and has a DTV allotment of channel 58. WJSU-TV merits a modest increase in power and antenna height specifications for its DTV operations as well as a substitute DTV allotment of channel 47.

The changes in DTV power and antenna height requested for WJSU-TV are needed to uphold a foundational principle of the entire DTV proceeding -- that a station's DTV signal should be able to replicate the scope of that station's analog signal. *See ATV Order* at ¶¶ 88-90. WJSU-TV's construction permit was recently modified to permit the station to operate with a substantially higher effective radiated power and antenna height. *See* FCC File No. BPPCT-970319KE. The application for this modification of facilities was filed on August 8, 1995, long before the DTV table of allotments was prepared. As described in the attached engineering statement, to replicate the area that may be served by the modified WJSU-TV, the Commission would need to increase both the power and antenna height specifications for WJSU-TV. *See* Exhibit 4.

Moreover, in order to eliminate the needless waste of facilities built for merely temporary allotments, the Commission should allot DTV channel 47 to WJSU-TV. This change would avoid the immense and, in this case, unnecessary burdens of a DTV allotment outside the core spectrum, and, again, may be

effectuated without causing unacceptable levels of interference to other licensees. *See id.*

5. WCIV(TV), Charleston, South Carolina

The Commission should also adopt channel 42 as WCIV's DTV allotment. WCIV's NTSC allotment is channel 4, and its proposed DTV allotment is channel 53. The substitute allotment would provide WCIV a DTV channel within the core spectrum without causing excessive interference to other broadcasters. *See* Exhibit 5.

CONCLUSION

In view of the foregoing, Allbritton requests that the Commission adopt the substitute DTV allotments for these stations as well as the appropriate antenna height and power specifications for WJSU-TV.

Respectfully submitted,

RKZ TELEVISION, INC.

By _____
John Crigler

HALEY, BADER & POTTS, P.L.C.
4350 North Fairfax Drive
Arlington, VA 22203-1633
(703) 841-0606

Its Attorneys

ALLBRITTON COMMUNICATIONS COMPANY

By _____
Mace J. Rosenstein
F. William LeBeau

HOGAN & HARTSON L.L.P.
555 Thirteenth Street, NW
Washington, DC 20004-1109
(202) 637-5600

Its Attorneys

Dated: August 22, 1997

EXHIBIT 1

ENGINEERING STATEMENT
RE REQUEST FOR CHANGE
IN DTV CHANNEL ALLOTMENT
KTUL(TV), TULSA, OKLAHOMA

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Allbritton Group, Inc., licensee of TV station KTUL(TV), Tulsa, Oklahoma in support of its request for a DTV channel which is part of the Commission's core spectrum for digital television operation. At present, station KTUL(TV) is licensed to operate on analog NTSC Channel 8 (180-186 MHz) with 316 kW effective radiated power (ERP) and 578 meters antenna height above average terrain (HAAT).

Under Sixth Report and Order in MM Docket 87-268, the Commission has allotted a new 6 MHz wide TV channel to each broadcast licensee for digital television operation. Station KTUL(TV) was allotted UHF Channel 58 with 1000 kW ERP and 578 meters antenna height for its DTV operation.

In Sixth Report and Order, the Commission also indicated that the core spectrum for DTV operation would be either TV channels 2-46 or channels 7-51. The Commission stated that it will monitor the testing and early implementation of DTV systems to decide the final core spectrum for the digital TV operation. The proposed DTV Channel 58 allotted to KTUL(TV) falls outside the core spectrum being considered for DTV operation. Therefore, KTUL(TV) requests the Commission to allot the station a DTV channel which is part of its core spectrum plan so that its DTV operation does not require a change in frequency after the transition period.

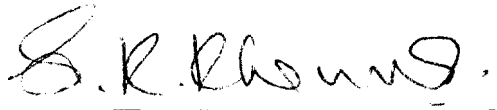
An engineering study was conducted to determine another suitable DTV channel, located in the core-spectrum, which would not result in predicted interference to the existing analog NTSC and other proposed DTV allotments. The service and interference analysis studies were made according to the procedure described in the OET Bulletin 69. The study indicates UHF Channel 27 can be allotted to KTUL(TV) in lieu of Channel 58 for its DTV operation. The attached Tables I and II list the pertinent analog TV stations and DTV allotments, respectively, which were considered for the allotment of DTV Channel 27 to KTUL(TV). These Tables indicate some of the minimum distance requirements listed in Section 73.623 of the rules for future DTV allotments would not be fully satisfied. However, most of the co-channel and adjacent channels analog NTSC and the proposed DTV allotments are located far enough not to have any significant impact on their operations from the proposed DTV Channel 27 operation at the KTUL(TV) licensed site.

The nearest co-channel analog NTSC station (KDEB-TV) is located 275.7 kilometers from the licensed KTUL(TV) site. Station KDEB-TV is licensed to Springfield, Missouri and currently operates with 5000 kW ERP and 515 meters HAAT. The nearest co-channel DTV allotment is for station KFOR-TV, Oklahoma City, Oklahoma which is located 175.2 kilometers from the KTUL(TV) site.

Although some interference is predicted to existing analog TV operations and the proposed DTV allotments, it is believed that such predicted interference falls within the

acceptable range of the DTV allotment process. The Commission itself has allotted DTV channels which result in some predicted interference to the current analog NTSC as well as the proposed DTV operations. However, such limited interference, as proposed in the case of KTUL(TV), was not considered excessive.

Respectfully submitted,



Sudhir K. Khanna
District of Columbia
Professional Engineer
Registration No. 8057

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
ANALOG NTSC TV ALLOCATION SITUATION
FOR THE PROPOSED DTV CHANNEL 27 OPERATION OF
KTUL(TV), TULSA, OKLAHOMA
AUGUST 1997

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623[1] km
DTV					
27	KTUL	Tulsa, OK	35-58-09[2] 95-36-55	--	--
ANALOG					
19	New[3]	Muskogee, OK	35-46-03 95-49-35	29.4	24.1-96.6
20	KKFT	Fort Scott, KS	37-26-36 94-39-31	184.5	24.1-96.6
23	KOKI-TV	Tulsa, OK	36-01-36 95-40-44	8.6	24.1-96.6
24	KPOM-TV	Fort Smith, AR	35-42-37 94-08-15	136.5	24.1-96.6
25	KOKH-TV	Oklahoma City, OK	35-32-58 97-29-18	175.8	24.1-96.6
26	KOZJ	Joplin, MO	37-04-36 94-32-10	156.3	9.7-88.5
27	KDEB-TV	Springfield, MO	37-11-40 92-56-04	275.7	244.6
28	New	Russellville, AR	35-22-41 93-16-49	221.3	9.7-88.5
29	KHOG-TV	Fayetteville, AR	35-22-41 94-04-59	138.2	24.1-96.6
30	KAQS	Shawnee, OK	35-16-50 97-20-14	173.8	24.1-96.6
31	New	Harrison, AR	36-14-34 93-13-15	217.7	24.1-96.6
34	New	Eureka Springs, AR	36-17-39 93-48-21	166.7	24.1-96.6
35	KRSC-TV	Clearmore, OK	36-24-05 95-36-33	48.0	24.1-96.6

[1]Minimum required distances or prohibited distance brackets for future DTV allotments.

[2]Licensed KTUL(TV) Site.

[3]Several Applications.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II
DTV ALLOCATION SITUATION
FOR THE PROPOSED DTV CHANNEL 27 OPERATION OF
KTUL(TV), TULSA, OKLAHOMA
AUGUST 1997

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623[1] km
DTV					
27	KTUL	Tulsa, OK	35-58-09[2] 95-36-55	--	--
26	KTEN	Ada, OK	34-21-34 96-33-34	198.2	32.2-88.5
27	KFOR-TV	Oklahoma City, OK	35-34-07 97-29-20	175.2	223.7
28	KGLB-TV	Okmulgee, OK	35-50-02 96-07-28	48.4	32.2-88.5

[1]Minimum required distances or prohibited distance brackets for future DTV allotments.

[2]Licensed KTUL(TV) Site.

EXHIBIT 2

ENGINEERING STATEMENT
RE REQUEST FOR CHANGE
IN DTV CHANNEL ALLOTMENT
WHTM-TV, HARRISBURG, PENNSYLVANIA

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of Harrisburg Television, Inc., licensee of TV station WHTM-TV, Harrisburg, Pennsylvania in support of its request for a DTV channel which is part of the Commission's core spectrum for digital television operation. At present, station WHTM-TV is licensed to operate on analog NTSC Channel 27 (548-554 MHz) with 2400 kW effective radiated power (ERP) and 498 meters antenna height above average terrain (HAAT).

Under Sixth Report and Order in MM Docket 87-268, the Commission has allotted a new 6 MHz wide TV channel to each broadcast licensee for digital television operation. Station WHTM-TV was allotted UHF Channel 57 with 110.6 kW ERP and 346 meters antenna height for its DTV operation.

In Sixth Report and Order, the Commission also indicated that the core spectrum for DTV operation would be either TV channels 2-46 or channels 7-51. The Commission stated that it will monitor the testing and early implementation of DTV systems to decide the final core spectrum for the digital TV operation. The proposed DTV Channel 57 allotted to WHTM-TV falls outside the core spectrum being considered for DTV operation. Therefore, WHTM-TV requests the Commission to allot the station a DTV channel which is part of its core spectrum plan so that its DTV operation does not require a change in frequency after the transition period.

An engineering study was conducted to determine another suitable DTV channel, located in the core-spectrum, which would not result in predicted interference to the existing analog NTSC and other proposed DTV allotments. The service and interference analysis studies were made according to the procedure described in the OET Bulletin 69. The study indicates UHF Channel 42 can be allotted to WHTM-TV in lieu of Channel 57 for its DTV operation. The attached Tables I and II list the pertinent analog TV stations and DTV allotments, respectively, which were considered for the allotment of DTV Channel 42 to WHTM-TV. These Tables indicate some of the minimum distance requirements listed in Section 73.623 of the rules for future DTV allotments would not be fully satisfied. However, most of the co-channel and adjacent channels analog NTSC and the proposed DTV allotments are located far enough not to have any significant impact on their operations from the proposed DTV Channel 42 operation at the WHTM-TV licensed site.

The nearest co-channel analog NTSC station (WVPY) is located 191.6 kilometers from the licensed WHTM-TV site. Station WVPY is licensed to Front Royal, Virginia and currently operates with 141 kW ERP and 398 meters HAAT. The nearest co-channel DTV allotment is for station WMPT, Annapolis, Maryland which is located 147.9 kilometers from the WHTM-TV site. Another co-channel DTV allotment which does not fully meets the minimum distance requirements of Section 73.623 for station WTXF in Philadelphia, Pennsylvania. Station WTXF is located 149 kilometers from the WHTM-TV site. There is hilly terrain between WHTM-TV and WMPT, and between WHTM and WTXF antenna sites

which would minimize interference to these two DTV operations from the proposed DTV Channel 42 operation by WHTM-TV. The Collocated operations of analog Channel 27 and DTV Channel 42 of WHTM-TV is not expected to result in mutual interference.

Although some interference is predicted to existing analog TV operations and the proposed DTV allotments, it is believed that such predicted interference falls within the acceptable range of the DTV allotment process. The Commission itself has allotted DTV channels which result in some predicted interference to the current analog NTSC as well as the proposed DTV operations. However, such limited interference, as proposed in the case of WHTM-TV, was not considered excessive.

Respectfully submitted,

Sudhir K. Khanna
District of Columbia
Professional Engineer
Registration No. 8057

COHEN, DIPPELL AND EVERIST, P. C.

TABLE I
ANALOG NTSC TV ALLOCATION SITUATION
FOR THE PROPOSED DTV CHANNEL 42 OPERATION OF
WHTM(TV), HARRISBURG, PENNSYLVANIA
AUGUST 1997

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623[1] km
DTV					
42	WHTM	Harrisburg, PA	40-18-57[2] 76-57-02	--	--
ANALOG					
27	WHTM	Harrisburg, PA	40-18-57 76-57-02	0	24.1-80.5
28	WBRE-TV	Wilkes-Barre, PA	41-11-01 75-52-02	132.9	24.1-80.5
34	WMGC-TV	Binghamton, MY	42-03-39 75-56-36	211.4	24.1-80.5
35	WYBE	Philadelphia, PA	40-02-26 75-14-20	149.0	24.1-80.5
38	WOLF-TV	Scranton, PA	41-26-09 75-43-45	161.5	24.1-80.5
39	WLVT-TV	Allentown, PA	40-33-58 75-26-06	131.6	24.1-80.5
40	WICZ-TV	Binghamton, NY	42-03-22 75-56-39	210.9	24.1-80.5
41	WXTV	Paterson, NJ	40-44-54 73-59-10	255.7	9.7-88.5
42	WVPY	Front Royal, VA	38-57-36 78-19-52	191.6	217.3
43	WPMT	York, PA	40-01-38 76-36-00	43.8	9.7-88.5
44	WVIA-TV	Scranton, PA	41-10-55 75-52-17	132.5	24.1-80.5
45	WBFF	Baltimore, MD	39-20-10 76-38-59	111.8	24.1-80.5
46	WSKG-TV	Binghamton, NY	42-03-22 75-56-39	210.9	24.1-80.5
49	WGCB-TV	Red Lion, PA	39-54-18 76-35-00	55.3	24.1-80.5
50	WBDC-TV	Washington, DC	38-57-44 77-01-36	150.4	24.1-80.5

[1]Minimum required distances or prohibited distance brackets for future DTV allotments.

[2]Licensed WHTM(TV) Site.

COHEN, DIPPELL AND EVERIST, P. C.

TABLE II
DTV ALLOCATION SITUATION
FOR THE PROPOSED DTV CHANNEL 42 OPERATION OF
WHTM(TV), HARRISBURG, PENNSYLVANIA
AUGUST 1997

Channel	Call	City/State	Geographic Coordinates	Distance	
				Actual km	Section 73.623[1] km
DTV					
42	WHTM	Harrisburg, PA	40-18-57[2] 76-57-02	--	--
41	WHSW-TV	Baltimore, MD	39-17-15 76-45-38	115.3	32.2-88.5
42	WPMT	Annapolis, MD	39-00-36 76-36-33	147.9	196.3
42	WTXF	Philadelphia, PA	40-02-26 75-14-20	149.0	196.3
42	WSKG-TV	Binghamton, NY	42-03-22 75-56-39	210.9	196.3
42	WPTT-TV	Pittsburgh, PA	40-26-23 79-43-11	235.6	196.3
43	WNJT	Trenton, NJ	40-17-00 74-41-20	192.3	32.2-88.5

[1]Minimum required distances or prohibited distance brackets for future DTV allotments.

[2]Licensed WHTM(TV) Site.

EXHIBIT 3

ENGINEERING STATEMENT
RE REQUEST FOR CHANGE
IN DTV CHANNEL ALLOTMENT
WSET-TV, LYNCHBURG, VIRGINIA

AUGUST 1997

COHEN, DIPPELL AND EVERIST, P.C.
CONSULTING ENGINEERS
RADIO AND TELEVISION
WASHINGTON, D.C.

This engineering statement has been prepared on behalf of WSET, Incorporated, licensee of TV station WSET-TV, Lynchburg, Virginia in support of its request for a DTV channel which is part of the Commission's core spectrum for digital television operation. At present, station WSET-TV is licensed to operate on analog NTSC Channel 13 (210-216 MHz) with 302 kW effective radiated power (ERP) and 625 meters antenna height above average terrain (HAAT), the maximum facilities permitted by the Commission for high band VHF stations.

Under Sixth Report and Order in MM Docket 87-268, the Commission has allotted a new 6 MHz wide TV channel to each broadcast licensee for digital television operation. Station WSET-TV was allotted UHF Channel 56 with 1000 kW ERP and 625 meters antenna height for its DTV operation.

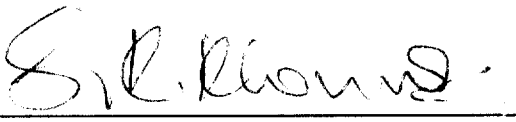
In Sixth Report and Order, the Commission also indicated that the core spectrum for DTV operation would be either Channels 2-46 or channels 7-51. The Commission stated that it will monitor the testing and early implementation of DTV systems to decide the final core spectrum for the digital TV operation. The proposed DTV Channel 56 allotted to WSET-TV falls outside the core spectrum being considered for DTV operation. Therefore, WSET-TV requests the Commission to allot the station a DTV channel which is part of its core spectrum plan so that its DTV operation does not require a change in frequency after the transition period.

An engineering study was conducted to determine another suitable DTV channel, located in the core-spectrum, which would not result in predicted interference to the existing analog NTSC and other proposed DTV allotments. The service and interference analysis studies were made according to the procedure described in the OET Bulletin 69. The study indicates UHF Channel 34 can be allotted to WSET-TV in lieu of Channel 56 for its DTV operation. The attached Tables I and II list the pertinent analog and DTV stations, respectively, which were considered for the allotment of DTV Channel 34 to WSET-TV. These Tables indicate some of the minimum distance requirements listed in Section 73.623 of the rules for future DTV allotments would not be fully satisfied. However, most of the co-channel and adjacent channels analog NTSC and the proposed DTV allotments are located far enough not to have any significant impact on their operations from the proposed DTV Channel 34 operation at the WSET-TV licensed site.

The nearest co-channel analog NTSC operation would be at Raleigh, North Carolina. Two applications have been filed for a new analog TV station on Channel 34 at Raleigh. The antenna site for both proposals is located 206.7 kilometers from the WSET-TV site. The nearest co-channel DTV allotment is for station WSOC-TV at Charlotte, North Carolina which is located 248.1 kilometers from the WSET-TV site. Due to the rugged terrain between the WSET-TV and Charlotte, and Raleigh, no actual interference is expected to these two operations from the proposed DTV channel 34 operation at Lynchburg.

Although some interference is predicted to other analog operations and the proposed DTV allotments, it is believed that such predicted interference falls within the acceptable range of the DTV allotment process. The Commission itself has allotted DTV channels which result in some predicted interference to the current analog NTSC as well as the proposed DTV operations. However, such limited interference, as proposed in the case of WSET-TV, was not considered excessive.

Respectfully submitted,



Sudhir K. Khanna
District of Columbia
Professional Engineer
Registration No. 8057